

Situation
Break: 2/14/84
Other: 51915

March 11, 1983

Mr. Merrill Hohman, Director
Waste Management Division
US Environmental Protection Agency
JFK Building
Boston, MA 02203

Stolberg

Re: New Bedford Remedial Action Master Plan
Draft Report by Roy F. Weston, Inc.

Dear Mr. Hohman:

We have reviewed the above referenced plan. Malcolm Pirnie, Inc. has been involved in PCB remediation feasibility studies on the Acushnet River Estuary for several years. We have also been involved in similar clean-up projects for the Hudson River, NY, Waukegan Harbor, IL, Niagara River, NY, Housatonic River, CT and other areas. Based on this extensive experience we have developed considerable insight into the remediation of problems of this type. In order to place current technological and economic feasibility considerations in proper perspective, we offer the following comments:

1. Page 2, Section 1.2, Page Paragraph 3: We do not believe that the clean-up activities of Aerovox and Cornell-Dubilier can be outside the scope of the RAMP. These two facilities may be the primary sources of PCB to the Acushnet River Estuary, and it would seem necessary to monitor the effectiveness of clean-up efforts on PCB levels in the sediments and water column in the upper part of the estuary.
2. Page 4, Section 1.3, Page Paragraph 4: Are the objectives of the New Bedford remedial action program consistent with those considerations listed in Part 300.68 of the National Contingency Plan (40 CFR 300)? The same conditions as in the estuary exist in the Hudson River, Waukegan Harbor, James River Estuary and elsewhere.

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3. Page 12, Section 1.2, Page Paragraph 4: Four reports are referred to as recent and comprehensive reviews of the New Bedford PCB problem. Two of them predate the availability of USCG sediment data for the upper part of the estuary. Another of the reports provides only general information on PCB levels found in sediment and water column samples but does not provide the available detailed information to better characterize the nature of the problem. A more detailed review of PCB levels in sediments, water column and aquatic organisms was presented by Malcolm Pirnie, Inc. in a September 1982 draft report for DEQE and in a final report dated December 1982. The data and the analysis in our final report provide a better basis for the Master Plan than those highlighted in the RAMP.
4. Page 14, Section 2.3.1, Page Paragraph 3: We do not entirely agree with the statement that most of the PCB contamination is in the uppermost 6 inches. There are insufficient deep cores to support this. Near Aerovox, levels exceeding 1,000 ug/g are common at 5½ to 6½ inches in depth. Levels exceeding 100 ug/g are found at depths of 9 to 15 inches in 7 of the 33 samples from this area. Studies in the upper Hudson River and Waukegan Harbor show deeper distributions. The density of PCB may be a factor, causing the contaminant to sink into the soft sediments. At one location near Aerovox, very high concentrations are found in the deepest portion of the sample.
5. Page 14, Section 2.3.1, Page Paragraph 4 and Figures 2-1a and 2-1b: Are the "composite" sediment values based on a straight arithmetic average of two values (surface and depth) or some other technique?
6. Page 14, Section 2.3.1, Page Paragraphs 2-6: The RAMP understates the presence of a 30 acre hot spot where concentrations generally exceed 500 ug/g in the upper 6 inches and in approximately 13 percent of the samples at depths of 8 to 12 inches.
7. Page 17, Section 2.3.1, Page Paragraph 5: Although the data are limited, the RAMP does not point out the apparent gradient in water column PCB levels from 4.0 ug/l in the upper estuary to less than 0.5 ug/l in the outer harbor outside the hurricane barrier (including the vicinity of the sewage treatment plant outfall).

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8. Page 18, Section 2.3.1, Page Paragraph 4: We believe that the "most pressing need" is the identification of suitable handling-disposal areas and methods. This point was also made by the New England Governors' Conference in recommendations included in the New England/ New York Long Range Dredge Management Study (September 1982) as noted below:
 - o The most critical dredge management issues still to be resolved are:
 - The need to identify and establish disposal sites.
 - The need to establish guidelines that match sediment characteristics to disposal methods.
- The siting, approval and design of necessary facilities will be the most controversial aspect of the New Bedford project.
9. Page 18, Section 2.3.1 Page Paragraph 4: The delineation of the Aerovox hot spot is largely completed and some additional cores to confirm PCB distribution with depth should be sufficient to allow this portion of remediation to proceed to the design phase.
10. Page 18, Section 2.3.1, Page Paragraph 5: We agree that modeling is only relevant with respect to the transport of PCB from hot spot areas to less contaminated areas and associated biota. This should not be the basis for a decision regarding hot spot remedial measures.
11. Page 25, Section 2.4, Page Paragraph 4: The report prepared by Malcolm Pirnie, Inc. for the DEQE is, in addition to an evaluation of dredging alternatives, a comprehensive review and compilation of all available data. Data regarding the distribution of PCB in the sediment are evaluated in a comprehensive manner using several methods in contrast to more simplistic techniques which have been used by others. The report points out the importance of water column levels on biotic uptake for the first time.
12. Page 26, Section 2.4, Page Paragraph 1: The evaluation of feasible alternatives is based on over seven years of involvement in similar projects in the Hudson River, NY, Waukegan Harbor, IL, Niagara River, NY and Housatonic

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River, CT. In several cases, project reviews and endorsements involved state agencies and USEPA Regions II and IV. The consensus of opinion on these projects and others such as the Duwamish Estuary, WA is that conventional dredging is the most feasible clean-up method. In addition, in the New England/New York Long Range Dredge Management Study prepared by the New England Governors' Conference, the following recommendation was made:

- o The best methods for dredging contaminated sediments are the pneumatic and hydraulic dredge methods since they provide the least chance for resuspension of sediments. Watertight mechanical (clamshell) methods may also be environmentally safe when used in conjunction with silt curtains.
13. Page 26, Section 2.4, Page Paragraph 1: The idea of developing in-situ treatment or containment technology is infeasible in relation to the proposed RAMP schedule, especially the "fast-track" time frames.
 14. Page 30, Section 3.1, Page Paragraph 3: It seems inappropriate to spend hundreds of thousands of dollars on an "in-depth evaluation of remedial alternatives" to reinvent the wheel for the Acushnet project. This money might be better spent on identifying suitable disposal sites or developing cost-effective destruction techniques.
 15. In general, the approach taken in the RAMP illustrates a major problem with the way Superfund is addressing remediation. This approach is symptomatic of problems encountered in the administration of Superfund and in developing practicable and timely remedial alternatives. There is no incentive for USEPA or its FIT or TAT consultants to build on what has already been accomplished elsewhere. It does not appear that USEPA or its consultant contacted the other federal or state agencies or their consultants involved in similar problems on the Hudson River, Waukegan Harbor or elsewhere. They seem to have operated in a vacuum by interpreting reports rather than by using the experience and expertise gained and developed by others to develop a practicable approach for the RAMP.

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We hope these comments provide a helpful basis for expediting the implementation of this important project. If you have any questions, please do not hesitate to call me.

Very truly yours,

MALCOLM PIRNIE, INC.

John C. Henningson / SKH
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Vice President
Environmental Sciences and Planning

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